

EPA comments on Swinomish Outreach and Education proposal, year 3

Thank you for the opportunity to review the proposal for the 3rd year of work on this project. We appreciate the applicant's leadership in using the potentially powerful tool of outreach and education to advance Puget Sound protection and restoration efforts in the Skagit watershed. We also appreciate the effort the applicant has made to address some of our comments on earlier proposals. The following are some additional comments on this year's proposal.

1. The applicant discusses, on pp. 3-4, the broader Puget Sound-wide outreach efforts led by the Puget Sound Partnership, but emphasizes that there is a "crucial need for targeted information regarding regulatory mechanisms to protect and restore water quality and fisheries resources within the Skagit Watershed and throughout Puget Sound" (top of p. 4). But proposed Task 2 is a statewide survey of attitudes and support about salmon and about water and habitat quality. The applicant should explain why, in light of the discussion on pp. 3-4 emphasizing the need for an education and outreach effort that, unlike the region-wide PSP effort, is targeted in terms of geography and content, Task 2 is designed as a geographically broad survey that is not specifically focused on regulatory issues.
 - In regards to why a statewide survey of attitudes and support for salmon, water quality, and habitat quality is proposed, rather than a targeted Skagit Watershed and/or Puget Sound survey, Swinomish and Strategy 360 collaboratively deemed that a statewide survey was necessary as Puget Sound regulatory change will most likely require statewide regulations. As statewide regulatory change is the most likely route to protect and restore Puget Sound water quality and fisheries, then it is necessary to capture the broader understanding of statewide views so that statewide support can be assessed and then garnered. The Partnership's current outreach and education efforts have been focused on *voluntary* change from Puget Sound residents, which is consistent with a Puget Sound-specific campaign. However focusing on voluntary change has not been successful in the Skagit watershed, which is why regulatory change and implementation is one of the Skagit Chinook Recovery Plan's highest priorities¹. That lack of voluntary change and success, coupled with the lack of success of the current regulations to stop the continual statewide habitat loss and degradation², has led Swinomish to conclude that this new approach is desperately needed.
2. The proposal, on pp. 4-5, describes the workplan for Year 2 (CY 2013) and explains that the Year 2 work plan was revised with the help of NWIFC. The Year 2 tasks described at the top of p. 5 do seem appropriate, but more information on these tasks and their outputs would be helpful in evaluating the Year 3 tasks (we have not seen the updated Year 2 workplan).

¹ Skagit Chinook Recovery Plan. (2005). Skagit River System Cooperative & Washington Department of Fish and Wildlife. Retrieved on March 14, 2012 from: <http://www.skagitcoop.org/documents/SkagitChinookPlan13.pdf>

² Northwest Indian Fisheries Commission (NWIFC). 2012. State of Our Watersheds Report. NWIFC, Olympia WA. 336p.

- a. For example, the inclusion of strategic planning with partners and the development of a Water Quality Coalition is a great idea and has the potential to be extremely valuable and we very much appreciate its inclusion in the Year 2 workplan. It would be helpful, though, if the applicant at least briefly describes the envisioned role/utility of the coalition/partners. Then, the applicant should, as part of the Year 3 workplan, describe what roles and functions the Coalition is expected to provide for Year 3 tasks.
- The partners for the Water Quality Coalition are currently being identified and assessed as a part of the Year 2 work, which has just recently begun (see most recent FEATS). Organizations that have been contacted include fishing groups, environmental groups, water quality and toxins coalitions, and conservation-minded organizations. Swinomish and Strategies 360 currently envision the role and/or utility of the prospective partners to be to assist in developing common messages and organizational objectives, assigning and partitioning coordinated outreach tasks, and building a strong collaborative voice and platform for support for regulatory change.
- b. I urge the applicant to give careful thought to the composition and design/charge to the Coalition members. What input/advice would be sought from them? What kind of representation would be most valuable to the project? There may be examples among other subawardees of ways of designing a steering group/coalition (e.g., the coordinating committee established under the Nisqually subgrant to Long Live the Kings for a marine survival research program).
- We appreciate this comment as we have given this issue very careful thought. Swinomish's goal is clear and the pathway to said goal (regulatory change) is relatively set. As such, we have been careful as to which groups we have contacted. We have had extensive internal conversations as to the best way to engage with the public at large and which constituents will be necessary to garner support for regulatory change. The groups that we have contacted thus far are like-minded organized and ones that have the ability to provide technical expertise necessary to achieve our goals.
- We have received the Marine Survival in the Salish Sea workplan from NWIFC that details Long Live the King's separation of a coordinating committee and technical team. We will fully review this workplan and, if we need additional information, will ask NWIFC for the appropriate contact information for the Nisqually and/or Long Live the Kings coordinator.
3. The Year 2 task entitled "Print and Radio media ads" seems to be redundant with Tasks 4 and 5 in the Year 3 workplan. The applicant should explain the difference between these two efforts to develop and deploy the media ads.
 - Included in the Year 2 workplan contract amendment was a revision to the timeline of the print, social and radio media ads task. The Year 2 timeline has been revised to reflect a more accurate start and end date for the Year 2 contract and, as such, the Year 2 and Year 3 timelines are not overlapping. Surveys have been built in to test the efficacy of the print, social and radio ads, which need to be continuously running in order to educate the public. In addition to testing the efficacy of the print, social and radio ads, we will be utilizing the surveys to assess, and if need be, adapt the content of the ads.
4. Budget Narrative, p. 10. In our Year 2 comments, we raised some questions about the bases of

the content and dissemination costs in the Year 2 budget. The applicant states that the bases for all cost estimates was its consultant, but the applicant should briefly describe what bases Strategies 360 used to develop these estimates.

- As shown within the workplan, the scope of services is delineated and general cost estimates provided. However, outside of the information provided, Strategies 360 does not provide a further cost breakdown. For the Year 1 work, Swinomish conducted a full competitive bid process in which a statement of work was written, a request for qualifications was posted in the local newspaper and online, and bids were received. Strategies 360 was the contractor that was selected based on the capability and qualifications of the bidders, the likelihood of the bidder's success, and the lowest price. We have continued to contract with them for the Year 2 and Year 3 work as they are uniquely qualified to continue this work. We are confident in the cost estimates that they have provided.
5. It would be helpful to reviewers if the applicant provided, as an attachment to the proposal, the "Public Information and Education Strategic Plan" mentioned on p. 4 of the proposal. In our Year 2 comments (see comment 1 from our Year 2 comments), we stated that more detail on what has been learned or accomplished so far in the identification of target audiences and general message development would help reviewers evaluate whether the proposed work would affect behavioral changes. The opportunity to see the Strategic Plan seems like it could go a long way to providing very helpful background to enable a more productive review.
 - We have attached the deliverable of this award that details Strategies 360's summary of findings from the research conducted.
 6. Under Task 2 of Year 3, the applicant will conduct a second survey. The applicant should provide more detail about this survey – for example, what specific questions/hypotheses will be tested, how the results will be used to inform and shape work in years 4-6 of this project.
 - The second survey is designed to test the efficacy of the print, social and radio ads and thus, will be mainly re-testing the first year's survey. Please refer to Strategies 360's summary of findings for more information on the survey conducted.
 7. P. 10, "Technical Review." The applicant indicates that technical review is not applicable to this project, but I think technical review is very relevant to this project, as the project involves specific quantitative technical methods (surveys) and specific expertise (education and outreach). I am thinking that the applicant may actually almost be there in terms of lining up appropriate technical review, though, and may just need to tweak the workplan to address this need. First, perhaps it would be possible to identify a potential stakeholder or partner, as part of the Year 2 Water Quality Coalition development task, with the appropriate technical expertise, who could provide technical input and advice during the project as part of their role as a member of the Coalition. In addition, under the Year 2 workplan, the applicant states that it will communicate with PSP for potential coordination and data sharing. Perhaps the applicant could add to this existing task that PSP would also be asked – since they are leading a major sound-wide and education effort – to provide technical input and advice during the life of this project. I do think it is important and potentially valuable to the project to provide for technical review, and I do not think the applicant is very far from having something appropriate on this.

- We appreciate the suggestion and do plan on engaging our partners to collaboratively develop the outreach strategy and, as such, provide technical input and advice during the project as part of their role as a member of the Coalition. As the Coalition members continue to emerge and cement, we will look to our partners to develop a more formalized technical review of the project.